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NSA MID SOUTH
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TRANSMITTAL LETTER FOR FINAL ENVIRONMENTAL ASSESSMENT PLAN AIRCRAFT FIREFIGHTING TRAINING FACILITY UNDERGROUND STORAGE TANK SITE MILLINGTON
SUPPACT TN
6/5/1992
ENSAFE

EnSafe / Allen & Hoshall
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June 5, 1992

Commanding Officer
SOUTHNAVFACENGCOM
ATTN: Wanda Ferris (Code 0232WF)
2155 Eagle Drive, P.O. Box 10068
Charleston, SC 29411-0068

RE: Final Environmental Assessment Plan - Aircraft Firefighting Training Facility UST site; Naval Air Station Memphis, Millington, Tennessee; Contract N62467-89-D-0318 Comprehensive Long-Term Environmental Action Navy (CLEAN); CTO-026

Dear Sir:

EnSafe/Allen & Hoshall is pleased to submit two copies of the Final Environmental Assessment Plan (EAP) for the Aircraft Firefighting Training Facility UST site at NAS Memphis. Also enclosed are written responses to SOUTHDIV comments on the Draft EAP. As requested, two copies have also been forwarded to Mrs. Tonya Barker at NAS Memphis.

If you have any questions, please contact me at (901) 383-9115.

Sincerely,

Lawson M. Anderson
Task Order Manager

Enclosure

cc: Tonya Barker, NAS Memphis
John Karlyk, EIC

Response to Comments
Draft Environmental Assessment Plan
NAS Memphis Aircraft Firefighting Training Facility
CTO-026

Comment 1

The approximate location of the aboveground storage tank has been shown.

Comment 2

EAP is correct. To make this clearer, the word *completing* has been changed to *implementing*. The difference between the fourth boring and the fifth boring referred to in the TDEC guidance is unclear, especially when release detection wells are already present. We are awaiting clarification from the TDEC. Implementation of the EAP will reflect the determination made by the TDEC.

Comments 3 through 8

The groundwater flow direction for the NAS Memphis area is believed to be toward the southwest. This is based on statements in previous studies completed at NAS Memphis[1]. Arrows have been placed on the site diagrams to indicate this assumed flow direction. RFI sample points have been indicated on the figures that show proposed soil boring and groundwater monitoring well locations. The RFI sample points selected for each tank area are intended to assess best and worst case conditions (upgradient and close to assumed release point, respectively). Mark Taylor concurs with this reasoning. Soil gas points and soil borings have been relocated as requested. One of the proposed groundwater wells will be located east of the oil/water separator if soil gas or boring data indicates a need. This location was not originally proposed because it would not be downgradient of a tank-related release (assuming groundwater flow is to the southwest).

Comment 9

Though flush mount wells are cheaper, stickup wells were recommended for unpaved, low-traffic areas to protect the integrity and service life of the wells. Flush mount wells should be installed at this facility only where absolutely necessary due to the large amount of fuel-contaminated runoff that is constantly present at the site. Flush mount wells that do not

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[1] Draft-Final RFI Work Plan, Memphis Naval Air Station, Millington, Tennessee (SOUTHDIV, May 1990)

eventually leak are rare. Surface runoff entering one of these wells would make all future data from that well suspect. Also, flush mount wells in unpaved areas are easily damaged by mowing equipment or heavy vehicles. NAS Memphis personnel have indicated that stickup wells will be acceptable in the non-gravel areas of the site, as long as pads and posts are installed to protect them.

Comment 10

Signed plan acceptance forms will be forwarded.

Comment 11

Method 418.1 for TPH is not being used, it is just included on the list in Appendix B. It is stated throughout Sections 1.0 and 2.0 of the EAP that the Gasoline Range Organics (GRO) method required by the TDEC will be used for TPH analyses. The GRO method is a GC-based method.

Comment 12

The field work schedule has been coordinated with Mr. Wayne Bethune. The soil gas survey is scheduled for June 14 and 15, 1992 and drilling activities are scheduled for June 20 through 29, 1992. The schedule includes working on Saturdays and Sundays in order to disrupt training activities as little as possible.

Additional Change

Please note that the estimated number of QC samples to be collected has been recalculated and Table 2-4 revised accordingly.